



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED  
SO ORDERED *Vern Brod***  
**VERNON S. BRODERICK**  
**U.S.D.J. 01/31/2025**

**Re: Muslim American Society of Queens, et al., v. U.S. Citizenship and Immigration Services, et al., No. 23 Civ. 2867 (VSB)**

Dear Judge Broderick:

This Office represents the government in this action, in which plaintiffs seek judicial review of the denials by U.S. Citizenship and Immigration Services (“USCIS”) of two Forms I-129, Petitions for a Nonimmigrant Worker, that plaintiff Muslim American Society of Queens filed on behalf of plaintiff Akram Abdelsattar Hassanin Kassab. I write respectfully to request a 21-day extension of the government’s deadline to file its reply in support of summary judgment and opposition to plaintiffs’ cross-motion for summary judgment and of its opposition to plaintiffs’ motion for additional discovery (i.e., from February 3, 2025, to February 24, 2025). After conferring with plaintiffs, I further request a corresponding extension of plaintiffs’ deadline to file their reply briefs. The new proposed briefing schedule would be:

- The government’s reply in support of its motion for summary judgment and opposition to plaintiffs’ cross-motion for summary judgment, and the government’s opposition to plaintiffs’ motion for additional discovery due by February 24, 2025; and
- Plaintiffs’ replies to the government’s oppositions due by March 17, 2025.

Pursuant to this Court’s order (ECF No. 23), on August 16, 2024, the government filed the certified administrative records of USCIS’s decisions on the Forms I-129 that plaintiffs are challenging in this case. ECF Nos. 24, 25. On November 15, 2024, the government filed its motion for summary judgment on all three of plaintiffs’ claims. ECF Nos. 32, 33. On January 6, 2025, plaintiffs filed an opposition to the government’s motion, a cross-motion for summary judgment on one claim, and a motion for additional discovery relating to the other two claims. ECF Nos. 34, 35, 36. Given the new motion for additional discovery, the government respectfully requests a short extension of its deadline to respond to plaintiffs’ filings so that counsel may adequately confer with USCIS and finalize the government’s multiple briefs. This is the government’s first request for an extension of its deadline to file its reply in support of summary judgment and opposition to plaintiffs’ cross-motion for summary judgment and its opposition to plaintiffs’ motion for additional discovery. Plaintiffs consent to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of record (via ECF)